

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
INDYMAC BANK, F.S.B.,

Case No.: 07 CV 6865 (LTS)

Plaintiff,

-against-

STIPULATION

NATIONAL SETTLEMENT AGENCY, INC.;  
STEVEN M. LEFF; RACHEL M. LEFF;  
RICHARD A. LEFF; JOHN DOES 1-100,

Defendants.  
-----X

IT IS HEREBY STIPULATED AND AGREED that the following facts and documents are submitted into evidence solely for the purpose of the motion of IndyMac Bank, F.S.B. ("Plaintiff") dated March 11, 2008, and the opposition of Sitt Asset Management, LLC and 180 Madison Owners, LLC ("Landlord") with respect thereto:

1. The Order of Attachment, Preliminary Injunction and Order allowing Expedited Discovery (the "Order of Attachment") dated August 16, 2007, which is annexed hereto as Exhibit A.
2. Process Receipt and Return alleging service of the Order of Attachment on Landlord on October 11, 2007, which is annexed hereto as Exhibit B.
3. The written lease agreement between 180 Madison Owners, LLC, as landlord, and National Settlement Agency, Inc., as tenant ("NSA"), which is annexed hereto as Exhibit C.
4. Check number 781319526 in the sum of \$113,413.34 and check number 781319527 in the sum of \$28,353.34, which are annexed hereto as Exhibit D.

5. Ledger of payments and charges for NSA's account through January 2008 for Suite 1203, which is annexed hereto as Exhibit E.

6. The judgment entered against NSA in the summary non-payment proceeding in the Civil Court of the City of New York, New York County (under L&T Index #91799/07), which is annexed hereto as Exhibit F.

7. Ledger of payments and charges for NSA's account through January 2008 for Suite 1201 and the hallway space, which is annexed hereto as Exhibit G.

8. Photographs of work performed by NSA's contractors in Suite 1203, which are collectively annexed hereto as Exhibit H.

9. Invoice dated July 5, 2007 from Sitt Asset Management LLC to NSA with respect to certain freight charges incurred by NSA, which is annexed hereto as Exhibit I.

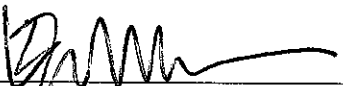
10. Letter dated May 11, 2007 signed by Steven Leff as president of NSA, which is annexed hereto as Exhibit J.

11. The notice of petition and petition in the summary non-payment proceeding between 180 Madison Owners, LLC v. National Settlement Agency, Inc. in the Civil Court of the City of New York, New York County (under L&T Index #91799/07), which is annexed hereto as Exhibit K.


12. NSA has not paid any of the rent or additional rent for the months of February 2008 and March 2008.

Dated: New York, New York  
April 1, 2008

FELDMAN WEINSTEIN & SMITH LLP

By:   
Eric Weinstein (EW-5423)  
Attorneys for Plaintiff  
420 Lexington Avenue, Suite 2620  
New York, New York 10170  
(212) 931-8715

CYRULI SHANKS HART & ZIZMOR LLP

By:   
Marc J. Schneider (MS 3438)  
Attorneys for Sitt Asset Management, LLC and 180 Madison Owners, LLC  
420 Lexington Avenue, Suite 2320  
New York, New York 10170  
(212) 661-6800